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April 7, 2022

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The Honorable Craig T. Goldblatt
United States Bankruptcy Court
824 Market Street
Wilmington, Delaware 19801

**Re: JAB Energy Solutions II, LLC (the “Debtor”)
Case No. 21-11226 (CTG)**

Dear Judge Goldblatt:

The Debtor submits this letter to update Your Honor on the status of the above-captioned bankruptcy case following entry of this Court’s *Order Approving Debtor’s Settlement Agreement Regarding Decommissioning of High Island A370 Project* [D.I. 193] (the “Order”). At the Court’s suggestion, the Debtor filed its *Motion to Reopen Case Solely to Permit Filing of Motion to Modify Preliminary Injunction* (“Debtor’s Motion to Reopen”), along with the Debtor’s *Motion to Modify the Preliminary Injunction* (together, the Debtor Motions), in the proceeding in the District Court for the Eastern District of Louisiana (the “Louisiana District Court”).

Turnkey Offshore Project Services, LLC (“TOPS”) filed an opposition to the Debtor’s Motions and, separately, filed its *Motion to Reopen This Matter* (the “TOPS Motion to Reopen”) and *Motion to Maintain the Injunction as to the Black Elk Funds and to Confirm this Court’s Continuing Jurisdiction to Ultimately Decide All Aspects of the Matter Before It Notwithstanding TOPS Having Filed a Proof of Claim in the Bankruptcy Proceeding* (together, the “TOPS Motions”).

The Louisiana District Court scheduled an in-person hearing on the Debtor Motions and the TOPS Motions for Wednesday, April 13, 2022. The Debtor will provide a further update following the



LAW OFFICES

The Honorable Craig T. Goldblatt
April 7, 2022
Page 2

Louisiana District Court's rulings on the Debtor Motions and the
TOPS Motions.

Counsel remain available at the Court's convenience if Your Honor has any questions or issues in the interim.

Very truly yours,

/s/ Laura Davis Jones

Laura Davis Jones

cc: All parties by ECF